

Exhibit G

Valerie Flegar

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
VALERIE FLEGAR**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)

: SS.:

COUNTY OF MONMOUTH)

VALERIE FLEGAR, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 3 Steward Lane, Manalapan, NJ.

2. I am currently 61 years old, having been born on January 11, 1961.

3. I am the wife of Silvano Flegar, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband died of leukemia on September 13, 2005 at the young age of 51. It was determined by the World Trade Center Health Program that his illness was causally connected to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. Silvano and I were married for 23 years and raised our two sons together. We were a team, supporting our family and getting by. He was my best friend.

6. Silvano was a night foreman for the NYC Department of Sanitation. He worked 12-hour shifts in the exposure zone starting on September 12, 2001. He was an emergency responder for the Department of Sanitation and supervised a large group of workers who were

down there doing recovery and cleanup. I remember that Silvano worked in lower Manhattan for six months, working nearly every day.

7. He became ill in late winter of 2004, going into 2005. By February 2005, we realized that something was really wrong. We went to the doctor, and they immediately sent him to the emergency room for blood work. Within two days, they diagnosed him with pre-leukemia. When we got the diagnosis, I was in shock for a couple of days. None of us knew anything about leukemia. I remember my son Chris doing online research about it, and me standing over his shoulder to read what he had found. I didn't want my husband to see how panicked I was. Within a month, the illness became full-blown acute myeloid leukemia.

8. Silvano was very optimistic. We thought a bone marrow transplant could save his life, but he was never healthy enough for a transplant. The cancer was so aggressive. We were in the hospital almost daily for his outpatient care. In mid-April 2005, we were in Staten Island Hospital for his chemotherapy treatments, but we never left his side. My entire family was devastated, but we rallied to try and get him through this. In the first week of August 2005, they sent him home and told us he had six weeks to live. From the time of his diagnosis until his death was six and a half months. Six months felt like six years. I didn't sleep for that whole time. It was torture. He was only 51 years old when he died.

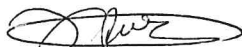
9. Financially, we took a huge hit after Silvano died. Because he was a city worker, he had unlimited sick time. The paychecks didn't stop for the whole duration of his illness. He had excellent medical coverage; we didn't have a lot of bills. I remember we spent a lot of money searching for a bone marrow transplant. We had a huge support system that was willing to step up and help us. But he died before he could even retire, so there was no pension. I worked for the Board of Education of the local school district at the time, not making a lot of money. My sons had just started college, which was expensive. They were 19 and 21 at the time of his death. I made it work. I used his life insurance policy to pay off our mortgage. But I'll always be struggling financially.

10. I think the emotional hardship will always be with me and my children. There's no compensation for the torture we went through. Watching him suffer was unfair. If 9/11 hadn't happened, I wouldn't have gone through that. I was cheated out of a lifetime with

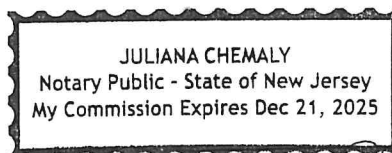
my husband. He was cheated in life, to only live to 51 years old. He will never meet our grandchildren, and that truly breaks my heart.


VALERIE FLEGAR

Sworn to before me this
28th day of March, 2022



Notary Public



Amanda Fugel

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
AMANDA FUGEL**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
: SS.:
COUNTY OF MONMOUTH)

AMANDA FUGEL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2 Topete Road, Manalapan, NJ 07726.

2. I am currently 28 years old, having been born on November 22, 1993.

3. I am the daughter of Joseph Fugel, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from pancreatic cancer on October 1, 2015, at the age of 58. His illness was determined by the World Trade Center Health to be causally connected to his exposure to the toxic air resulting from the 9/11 terrorist attacks.

5. My dad was my best friend. We did everything together. I was closer to him than I was to my mother. He was always there for me. He would always come to my choir shows and my voice recitals. We would work together at our family business. Losing him was really devastating for me. I was the first in our family to graduate college, and the first in our family to go to law school. It was really heartbreaking for him not to come to my college graduation.

Now, he's going to miss out on my law school graduation, too.

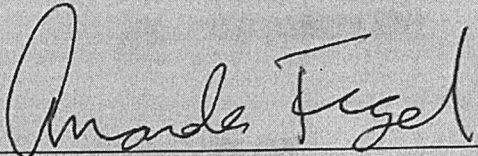
6. My father was a first responder. He was down there in the rubble at the World Trade Center, helping out with the clean-up. I know he was there on several occasions over a few months. I was very young when this happened, however. I've seen the federal ID card that he was issued that let him in to the World Trade Center site.

7. My dad was part of the World Trade Center Health Program at Rutgers, run by Dr. Iris Udasin. He would go in for a check-up every six months. His pancreatic cancer wasn't showing up on any of his scans at first. Dr. Udasin was devastated that they couldn't catch it earlier. I remember that my dad was suffering from severe back pain, and out of nowhere his blood sugar started to spike. We took him to the emergency room at Robert Wood Johnson Hospital in October 2014, where he was diagnosed with Stage IV pancreatic cancer. I was terrified, scared, not sure what to think. Everything I looked up online about pancreatic cancer told me that it was fatal. I wished and prayed that he would get any other cancer but this one. I started to plan for the best course of action for my dad. He was ready to fight through anything because he wanted to be there for my sister and me.

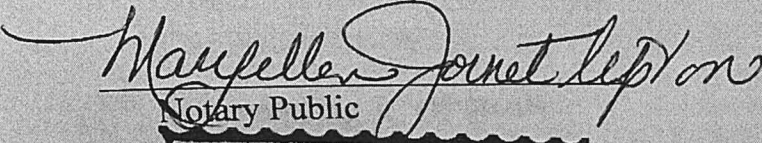
8. We took my dad to Sloan Kettering Cancer Center for his treatment. He went through chemotherapy and three eight-hour Whipple procedures. I was my dad's primary healthcare proxy. I helped manage a lot of his day-to-day issues. At the time, I was working part-time for Merrill Lynch, and I was a full-time college student. I was driving him to chemotherapy twice per week from central New Jersey to New York. The recovery from his Whipple procedure took weeks, maybe months, and I was visiting him in the hospital every day. He told me I should do whatever it took to graduate college on time. The emotional roller coaster of my dad's cancer took a huge toll on my life. I was trying to juggle everything at once and put my best foot forward. I wanted to put on a brave face for my sister, mom, and dad. But I knew the inevitable was coming because it was pancreatic cancer.

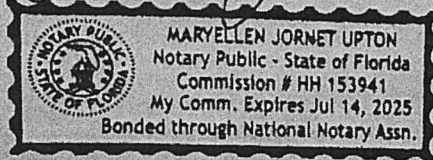
9. I've missed out on so many milestones with my dad. Not just the college graduation and the law school graduation. My dad and I were best friends, and we always used to watch those wedding shows together on TV. He would say that he was so excited to walk me down the aisle one day. Now, he'll never be able to do that. I think the courts should keep in mind the emotional toll that these deaths have had on people's families. Losing a loved one,

losing a family member that people rely on. They'll never be able to get that back. I'll never get over my dad's death.


AMANDA FUGEL

Sworn to before me this
29 day of July, 2022


Notary Public



Angela Fugel

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
ANGELA FUGEL**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

ANGELA FUGEL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2 Topete Road, Manalapan NJ 07726.

2. I am currently 59 years old, having been born on November 11, 1962.

3. I am the wife of Joseph Fugel, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from pancreatic cancer on October 1, 2015, at the age of 58. His illness was determined by the World Trade Center Health to be causally connected to his exposure to the toxic air resulting from the 9/11 terrorist attacks.

5. He was my everything. We would have been married for thirty years. We were inseparable and did everything together. We raised two beautiful daughters. I had a good and happy life with Joseph. Now he's gone. He passed at the young age of 58. He was too young to go.

6. Joseph was a first responder at Ground Zero. He went down there with other people, some friends. I don't know exactly what he was doing down there. It's hard to remember that far back. He went several times down to the World Trade Center site. Although we all witnessed it on the TV, Joseph would tell me about what he experienced. It was heartbreaking. Very sad and scary, there was a lot of confusion.

7. Joseph was a hard worker and a very strong man. He weighed over 200 pounds. I started to notice that he wasn't feeling well in 2013, maybe even earlier than that. He started complaining about persistent back pain, so I took him to the local hospital in Manalapan. They didn't really do much, because, quite frankly, I don't think they knew what was actually going on. He started deteriorating rapidly. He was losing a lot of weight and was always tired. He spent a lot of time in bed. He definitely wasn't himself. We took him to another hospital where they did MRIs and scans on him. In October 2014, he was diagnosed with pancreatic cancer. It was shocking and a total nightmare when we got the news.

8. The news of his diagnosis was extremely stressful and changed my life completely. I became his full-time caregiver. He ended up going to Sloan Kettering for his cancer treatment, and I took him to every chemotherapy session. The nurses taught me how to change and clean his colostomy bag. It was hard to balance my life as a mother with my life as a caregiver for my husband. We had two young girls in school. I had to do all the household activities that he used to do, from taking out the garbage, to repairing the house, grocery shopping, raising our daughters, schooling, and laundry. It was hard to do all that alone. I didn't even know how to maintain our backyard or home. But Joseph was in so much pain, and he only wanted me to take care of him. I understood, but it was very hard on me. He took lots of medications and he wasn't himself. When you're in pain, you snap more easily. The chemotherapy left him irritated and exhausted. There were days where he couldn't even get out of bed.

9. It was so painful to see my husband suffering. He was too young—only 56 when he really started to get bad. It affected his mental condition. He had bouts of forgetfulness and had trouble focusing. He was not his usual, outgoing self. It was hard to watch, because before that his mind was as sharp as a whip. Towards the end, he was on so many medications that he was in a total daze. He appetite had decreased to the point where he really didn't eat much. My

daughters tried to help them as much as they could. They would make special meals and shakes for him so he could have something to eat with the pills. I remember him often being sick to his stomach and throwing up in the toilet. It was horrible to watch.

10. My daughters and I were totally heartbroken when he passed. He'd no longer be there for all the milestones in their lives. No more Christmases, birthdays, or holidays. Our daughters have grown up to be beautiful, strong young women. They have his outgoing personality. They do good for others, volunteer, and help their neighbors—just like Joseph did. Joseph was a very strong and honest man. There's not a week that goes by that someone in my neighborhood doesn't say to me, "Angela, Joseph was a great man. What a shame that he's gone." We had a lot of success in life before his illness and it was all sucked away by the pancreatic cancer. It was totally unexpected. He was the head of the household and he handled everything for me, so it is very tough to be on my own. It's just horrible what happened to him. I hope everyone involved in this case gets justice for that horrible day in New York. I miss you, Joe, and I love you.


ANGELA FUGEL

Sworn to before me this
28 day of March, 2022


Notary Public

NUZHAT N KHAN
Notary Public
State of New Jersey
My Commission Expires July 29, 2025

Paul Garipoli

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
PAUL GARIPOLI**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF PENNSYLVANIA)
 : SS.:
COUNTY OF NORTHAMPTON)

PAUL GARIPOLI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2383 Blue Jay Drive, Nazareth, PA 18604.

2. I am currently 52 years old, having been born on October 15, 1969.

3. I am the husband of Christine N. Garipoli, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On November 20, 2017, my wife Christine died from brain cancer at age 45. It was medically determined that this illness was causally related to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Christine and I were married with two children. At the time of her passing, our children were 15 years old and 11 years old. We were a normal family with small, growing kids. Christine battled brain cancer for about five years. We had lots of bills at that time and were living paycheck to paycheck. We tried to be a normal family the best we could. We took our kids out to eat at restaurants when we could afford it, went for walks in the park, had a dog, and went for day trips.

6. At the time of September 11, 2001, Christine worked at 60 Wall Street for JP Morgan Chase. On that day, she was in the office. I was in my office at 2 World Trade Center on the 65th Floor, and I almost lost my life in the building. I ran to 60 Wall Street, and the security guard let me in before the World Trade Center collapsed. I was able to meet up with Christine, and we waited for hours before we were allowed to leave. It was so scary, lots of debris coming down around us. It was like a movie, but real. Then we had to walk a long, long way home through the dust.

7. Christine returned to the office right away. I can't remember exactly how long after the attacks it was, but she went back to work pretty quickly. She returned to her offices at 60 Wall Street. The World Trade Center site was still smoldering when she went back to work.

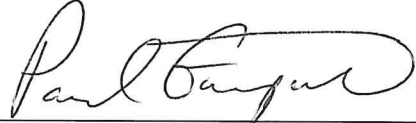
8. Christine had a seizure on New Year's Day in 2013. We went out to dinner and came home at around 9:00 p.m. I heard a "thud," and thought one of my kids had fallen out of bed. I found Christine lying on the floor; she was having a seizure. I rushed her to Saint Luke's Hospital in Bethlehem, PA., where we were told she had a brain mass. Christine was diagnosed with an astrocytoma in January 2013, and soon began to undergo radiation. She beat the astrocytoma with radiation. Later on, she was diagnosed with glioblastoma. We learned after we got back from the doctor's office what a glioblastoma was and the prognosis. Our whole family was in denial.

9. As Christine's husband and the father of our children, it was hard. The hardest part was lying to her. Christine used to be a part-time cafeteria monitor at the local elementary school, and she loved the children. When she was sick at home with brain cancer, she would tell me how excited she was to see the children again. I had to lie to her and tell her she would be able to go back and see the children. Christine loved Disney, and we would go every year. She would tell me how excited she was to go back to Disney World and see Mickey Mouse. It was hard knowing that wasn't going to happen. I had to wear a poker face. I felt like I had to lie to protect her. I would always cry to myself after lying to her, because I knew she wasn't going to survive.

10. We had financial difficulty, even in the times when we both worked. Christine worked for a big company and so did I. When Christine got sick, she had to scale back to part-time work. I worked full-time with an average salary, and we lived paycheck to paycheck.

Sometimes our extended family would support us financially. It was hard when you just wanted to do little things but couldn't afford them. We tried to get by.

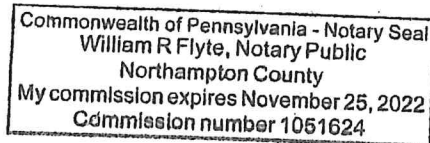
11. Christine was a "straight arrow." She was extremely healthy before being diagnosed with brain cancer. She never smoked, never did drugs, and only drank a glass of wine at a restaurant on occasion. At the end of her life, I had to help her with everything. She couldn't even use the bathroom on her own. I'll never have closure. It's not fair that she's not here anymore, and she was taken too early.



PAUL GARIPOLI

Sworn to before me this

4th day of April, 2022


Notary Public

Frank Provino

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
FRANK PROVINO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

FRANK PROVINO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 10 Fillat Street, Staten Island, NY 10314.

2. I am currently 80 years old, having been born on November 12, 1941.

3. I am the father of Christine N. Garipoli, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On November 20, 2017, my daughter Christine died from brain cancer at age 45. It was medically determined that this illness was causally related to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Christine was everything to me. She was my child. From the time she was little, I taught her everything I knew. I even taught her how to drive, and she was a fantastic driver. Once Christine got married and had kids, she moved to Pennsylvania. But we saw them often and would all go on family trips together. She loved Disney World, and we went there a lot.

6. When Christine got sick, I chauffeured her and her family from Staten Island to Pennsylvania. I would stay at her house for weeks at a time, helping with the kids when she got

too sick. I would pick her kids up from school, drop them off, and make them dinner. I would take care of Christine when she got sick. My heart broke every time I looked at her. I wished I could take the pain away.

7. On September 11, 2001, Christine worked for JP Morgan Chase at 60 Wall Street, on the corner of Wall Street and Broad Street.

8. On January 1, 2013, Christine had suffered a seizure and my son-in-law took her to the hospital. He called us and we met them in the Emergency Room at St. Luke's Hospital. The doctor told us she had astrocytoma, a form of brain cancer. My heart sank. She went through a series of radiation treatments, which caused her to lose her hair, but she got better. I was so relieved.

9. Then, in August 2017, Christine was diagnosed with glioblastoma. The cancer came back and was worsening. It was just plain terrible. I tried to help them out as much as I could, running back and forth from Staten Island to Pennsylvania. My wife and I tried to help them financially, making sure they had everything they needed. We gave her money for whatever she wanted. But she wasn't selfish or self-centered. She was beautiful, and I would have given anything to make her well, but I couldn't. Three months later, in November 2017, she was taken from me. My sadness was unbearable, but I had to stay strong for my wife, my son-in-law and my grandkids. But I knew I would never be the same.

10. I myself wound up with prostate cancer, malignant melanoma, and sinusitis, all due to my own 9/11 exposure. I also lost my brother to his 9/11-related exposure. He was a bricklayer for the New York Transit Authority after 9/11 and was also diagnosed with cancer.

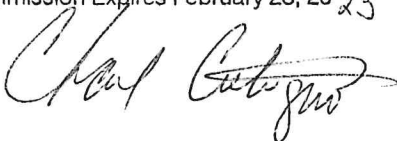
11. I was disgusted and devastated by Christine's illness and ultimate death. It was so painful to watch my child suffer and die. Those responsible for the terrorist attacks should be held accountable.



FRANK PROVINO

Sworn to before me this
4th day of April, 2022

CHARLES CUTUGNO
Notary Public, State of New York
No. 01CU4720961
Qualified in Richmond County
Commission Expires February 28, 2023



Joanne Provino

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
JOANNE PROVINO**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF RICHMOND)

JOANNE PROVINO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 10 Fillat Street, Staten Island, NY 10314.

2. I am currently 75 years old, having been born on October 23, 1946.

3. I am the mother of Christine N. Garipoli, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On November 20, 2017, my daughter Christine died from brain cancer at age 45. It was medically determined that this illness was causally related to her exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Christine was the center of our family; she was our whole world. We would spend every holiday at her house with her husband and kids in Pennsylvania, and we would visit her family and go to the shopping malls and eat lunch with her and the grandchildren. We would talk on the phone every single day, even when I was at work. We would spend time with her on the weekends, and we would go to Disney World as a family every year. When Christine turned 40 years old, she organized a whole trip for our family to Disney World to celebrate her

birthday. We made about six trips to Disney World in total. The last trip was in 2017, and that was the year Christine passed away.

6. On September 11, 2001, Christine worked at 60 Wall Street. Christine's husband, Paul, had worked in one of the towers that went down. Thankfully, he was able to get out, but he had no office to return to. Since Christine's building was still standing, she was there in the office all day, every day.

7. On New Year's Day 2013, we found out that Christine had brain cancer. We didn't spend New Year's with them that year, but we got a call from Paul at 10 p.m. that night telling us that Christine was having a seizure. We went to Saint Luke's Hospital where Christine was in the emergency room. The doctor said Christine had a mass on her brain, but it was treatable. She was diagnosed with an astrocytoma. It was so frightening. She was able to beat the astrocytoma with radiation.

8. She was diagnosed with glioblastoma in August 2017, after she came back from Disney World. She was diagnosed August and died in November 2017. She was 45 years old. It was heartbreaking to watch my child deteriorate.

9. Emotionally, we were extremely worried. My husband and I continued working, even when we should have retired, in order to give Christine extra money. I worked until I was 72 years old. She and Paul (Christine's husband) could not afford to pay for things on their own. We would drive out to Pennsylvania every week towards the end of Christine's life. We had to help her when things got bad, even helping her go to the bathroom. I could hardly touch her, she was in so much pain. It was like a nightmare. She even lost her sight at one point. One night, I kissed her goodnight and she said goodnight to me and Frank (her father), and those were the last words I ever said to her.

10. My grandson Christian, Christine's son, was the light of her life. He was very into baseball and Christine would take him to every game. She loved her children. Christian went into a depression after Christine passed. It was like you looked right through him. I ached for him, for us all. I wanted to take away his pain.

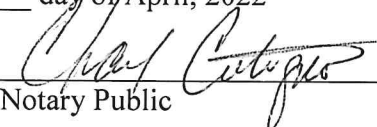
11. Our family is just broken from her death. I still cry every night, but it's not going to bring Christine back. It seems like she was sick for so, so long. But it really wasn't such a long time in years. She had a horrible, horrible death in the end. I hate the nighttime. When I go to

sleep, I can't help but think of what happened to her. I miss my daughter. I wish I could speak to her everyday like I used to. I will never get over that she is gone.


JOANNE PROVINO

Sworn to before me this

4th day of April, 2022


Notary Public

CHARLES CUTUGNO
Notary Public, State of New York
No. 01CU4720961
Qualified in Richmond County
Commission Expires February 28, 2023

Birla Gonzalez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
BIRLA GONZALEZ**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

BIRLA GONZALEZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 Keogh Lane, New Rochelle, NY 10805.

2. I am currently 50 years old, having been born on June 25, 1971.

3. I am the wife of Fernando Augusto Gonzalez, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. On March 9, 2014, my husband died from thymic cancer at the age of 50. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. Fernando and I had a beautiful family. We lived with our two kids, and he was a wonderful father to our children. He took care of us all.

6. My husband worked for the Department of Corrections. His job sent him to the World Trade Center site for a six-month detail to clean the debris and perform recovery operations. He would search through the rubble for survivors and victims, and then he would transport the rubble to the ships that took it to the dump. I don't think anyone knew it would

take six months to clean up, or that so many people would get sick from being there. He was breathing in all that dust every day.

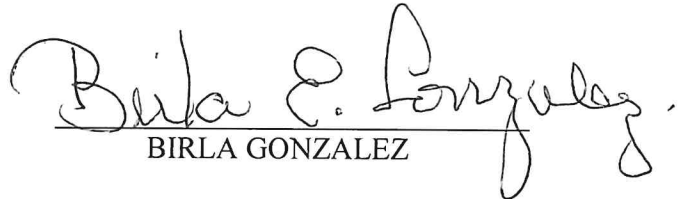
7. I started to notice that his condition was worsening. He was very good at hiding things. You had to pay close attention to how he was doing. I noticed that his hair was starting to fall out. He was approaching fifty years old, but he wasn't so old that all his hair would start falling out. He was still a young man. So, he shaved his head. His hands became fragile, he didn't have as much dexterity as he used to. His eyesight also started to decline. Simple things took longer for him, even walking. His step became heavier, like his feet were dragging. It took a lot of energy for him to do anything.

8. I was there with him at the doctor when he received the diagnosis of thymic cancer. It was a terminal prognosis—they gave him six months to live. I was devastated and heartbroken. When Fernando was diagnosed with cancer, he tried to hide it. We hid the diagnosis from our children at first. Fernando was strong, stoic, and never wanted to let anything upset him. He was a corrections officer, so he had a tough attitude. But once he was diagnosed with cancer, he became more sentimental. Everything meant more to him after his diagnosis. He knew that he wasn't going to last. He wanted to move to Florida, because it was always his wish to move there when he retired. So, we packed up our family and moved to Florida.

9. I was working as an esthetician before we moved to Florida, but I quit my job to become my husband's full-time caretaker. I didn't want him to be in a nursing home, and I didn't want anyone else taking care of him. I went with him to every chemotherapy appointment, every doctor's visit and hospital stay. I would coordinate his medicines and feed him at home. I would help him with even simple tasks such as getting around the house. He was extremely drained from all the chemotherapy and medications. My children eventually learned of their father's cancer diagnosis. My daughter had to start driving him around, and she had barely just learned how to drive. Small things frustrated him, because he didn't have as much control of his body as he used to. Everything took twice the amount of energy it used to. He was irritated that he couldn't walk around, or even walk down the stairs. He was in a lot of pain. It was hard to watch my husband suffer. Witnessing his pain caused me to be depressed. He had a hard struggle with cancer. I cried and I prayed for him every day.

10. Since my husband has passed, my life has never been the same. I have been extremely depressed. It is difficult for me to even function normally in daily life, and my children have taken over many of the household responsibilities. Physically and emotionally, Fernando's death has taken a huge toll on me. There are days where I can't even get out of bed.

11. I miss having a whole family. My life has never been the same since my husband passed away. I can't do anything anymore. We received some financial help after Fernando's death, but our lives have changed drastically. But no matter what, I'll never get over this loss. I do everything for my family—for my kids, my loved ones. Fernando did the same. He was a wonderful husband and father. God bless all the people who were affected by 9/11. All the people in our situation are suffering. I miss my husband, my love.


BIRLA GONZALEZ

Sworn to before me this
14th day of April, 2022


Notary Public

OUSMANE DIOP
Notary Public State of New York
No. 01DI6392371
Qualified in Westchester County
My Commission Expires May 23, 2023

Fernando Dar'thanian Gonzalez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF FERNANDO
DAR'THANIAN GONZALEZ**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

FERNANDO DAR'THANIAN GONZALEZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 Keogh Lane, New Rochelle, NY 10805.

2. I am currently 23 years old, having been born on July 2, 1998.

3. I am the son of Fernando Augusto Gonzalez, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from thymic cancer on March 9, 2014. He was only 50 years old. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was very involved in my life. We would go out on "boys' days" together, race remote control cars, ride bikes, and play baseball together. We had wonderful times together. We had a close, intimate connection as father and son that will stay with me for my whole life.

6. I was only four years old on September 11, 2001. I didn't know what was happening at the time. All I knew is that my dad wasn't around for a long period of time. I learned more secondhand as I grew up. I learned that he was part of the operations for recovery and clean-up at the World Trade Center site. He worked for the Emergency Services Unit as a part of the NYC Department of Corrections. He worked with other NYC agencies to clean and transport the rubble to dumps in New Jersey and Staten Island. I was so young at the time that I didn't even remember the Twin Towers. It seems like they weren't even there, yet they still took so much from me.

7. I found out about my dad's illness by accident. I was thirteen years old or so, and I was using my dad's laptop for a school assignment. I stumbled upon a document which said that my dad was diagnosed with cancer. Even though I was young, I understood how serious cancer was. My parents had tried to keep his illness from me so that I could finish the school year. At the time, I was so upset that they didn't tell me. But now, I realize that that was the hard choice parents sometimes have to make.

8. I had noticed that my dad was getting sick, but before I learned of his diagnosis, we didn't talk about it. I had my suspicions. He was home more often, and he was less active. I knew something was wrong. From the time I learned of his diagnosis, it got worse and worse. In my eyes, my father was a strong and stoic figure. I saw him turn into a shell of a man in just two years.

9. My father told our family that he wanted to live the rest of his days out in Florida. He wanted to have a home and live the American Dream. So, we moved our family to Florida when I was a sophomore in high school. It was hard. I knew that I had to be stronger than I was in the past and put on a brave face for my parents. We all buckled in for a difficult ride. I wasn't thinking about myself at the time, I was thinking about what I could do for my father. He wanted to be home as much as possible, because he didn't want to be in the hospital. He was adamant about it. I wanted to join my new high school's baseball team, but I gave it up to take care of my father. I was sad but looking back I'm happy I chose to spend that time with him instead.

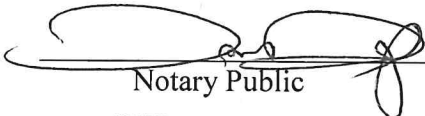
10. I remember one night after my father had come back from the doctor. We were having dinner as a family. He started by telling us that he "couldn't do this anymore." He had

just been given a prognosis of six months to live. At that point, he had been going through chemotherapy for over a year. He couldn't bear to do the treatment anymore, as it had put him through excruciating pain, and it wasn't working. He ended up living for another two years after that. The fact that this strong man had to sit in front of his family and tell them that he was giving up really hurts me. I still think about it.

11. From a young age, seeing my father wither away caused me a great amount of pain. He hid his pain, and he was so strong. I want to dedicate my life to make sure no one else ever has to experience the same pain that he did. Every day, I try to help others so that they never have to feel that way. That's why I want to study medicine, so that I can help families going through the same experience. Because I couldn't help my father, but I can still help someone else.


FERNANDO DAR'THANIAN GONZALEZ

Sworn to before me this
14th day of April, 2022


Notary Public

OUSMANE DIOP

Notary Public State of New York

No. 01DI6392371

Qualified in Westchester County

My Commission Expires May 23, 2023

Storm Gonzalez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

**AFFIDAVIT OF
STORM GONZALEZ**

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF WESTCHESTER)

STORM GONZALEZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 Keogh Lane, New Rochelle, NY 10805.

2. I am currently 26 years old, having been born on November 9, 1995.

3. I am the daughter of Fernando Augusto Gonzalez, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from thymic cancer on March 9, 2014. He was 50 years old. It was medically determined that this illness was causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My father was like my best friend. We did everything together. On weekends, when we had free time, we would go on trips to the city, walk around and eat pizza, and enjoy each other's company. We had a special father-daughter bond. He always supported me in school, basketball, and any activity I did.

6. I was only in first grade on September 11, 2001, so I don't remember much. I learned more as I got older. He was part of the Emergency Services Unit, which is part of the

NYC Department of Corrections. They sent him to the World Trade Center site for a six-month detail to clean the debris and perform recovery operations. I don't think anyone knew it would take six months to clean up, or that so many people would get sick from it. He was breathing in all that dust every day that he was there.

7. I noticed slow changes over time with my father, but you could tell he had a lot less energy. He was diagnosed with thymic cancer in 2012. My parents first tried to hide the cancer from my brother and me. I found out about his cancer 2013, when I was a senior in high school. They had good intentions, but it caused a lot of resentment at first. I was just so sad and scared. I was only 17 years old at the time, and I didn't fully understand what was going on. When you hear "cancer," you think, this person is going to be gone soon. Knowing that my father had cancer made high school pointless. What's the point in graduating if your parents can't see you graduate?

8. I had to do my part to help as my father fell ill. My parents gave me a car, and it was my job to get my younger brother ready for and driven to school. After school, I would pick him up and make dinner for him. I became a stand-in parent. It was hard. I wanted to just enjoy my teenage years, but I couldn't enjoy anything because there was so much going on at home. I just had to do what my parents told me. I wanted to help my father in any way that I could. It was frustrating and sad.

9. As my father became more ill, he stopped working. My father wanted to retire in Florida, so we moved down to Florida as soon as I graduated high school. He wanted to enjoy the time he had left in warm weather. He wanted to have more time together as a family. I was accepted to a nice college in Florida, near the beach. It would have been great to go, but I had to decline the offer to stay home and take care of my parents. There was no point in going to college while my dad was suffering. It was more important for me to take care of him. I got a job at McDonalds to support my parents financially. There were lots of new expenses since we moved to Florida, and medical bills were piling up.

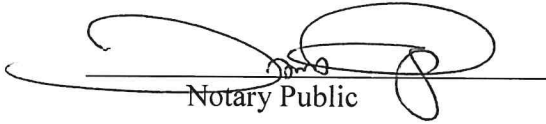
10. I drove my dad to the hospital, brought him to every chemotherapy appointment, and went to the pharmacy for him every day. We spent a lot of time together, but it wasn't "good" time. I was only 18 or 19 at the time. Those last two years weren't the time that you wanted to spend with a parent. I was more like a caretaker than a daughter. Making my dad eat,

giving him his medications. Taking him to see doctors and lawyers. Watching him in pain during the chemotherapy. I remember how the chemotherapy and the medications just drained him. Once he passed, I was so sad and depressed. But at least I knew that he wasn't in pain anymore.

11. People should know that my father's death was not in vain. He had to do his job, and he wanted to do his job. He helped hundreds of people find their lost loved ones at Ground Zero. It was a hard time for the whole country. I know that he was a hero. I think about him that way, but I also know that he was taken away from me too soon. He was my best friend. I wish our time together was longer.


STORM GONZALEZ

Sworn to before me this
14th day of April, 2022


Notary Public

OUSMANE DIOP
Notary Public State of New York
No. 01DI6392371
Qualified in Westchester County
My Commission Expires May 23, 2023

Caroline Halpin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GERARD PATRICK AHEARN, et al.,

AFFIDAVIT OF
CAROLINE HALPIN

Plaintiffs,

20-CV-00355 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF ERIE)

CAROLINE HALPIN (now known a Caroline Clauss – married name), being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 152 Fargo Avenue, Buffalo, NY 14201.

2. I am currently 29 years old, having been born on January 28, 1993.

3. I am the daughter of John James Halpin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed from chronic bronchial asthma on May 29, 2014, at the age of 61. He was also suffering with throat cancer at the time. It was medically determined that these illnesses were causally related to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. I had a really good relationship with my dad. He was big on school; he always made sure we were getting good grades and had perfect attendance. He took me to soccer, cheerleading and horseback riding practices. He always supported my passions and goals. He worked hard to make sure my brothers, sister and I all had the same opportunities. He worked a

lot, and he instilled a strong work ethic in each of us. But he also enjoyed when he had time to relax. During the summer, we would go to Long Beach Island, where he loved to swim.

6. I remember the morning of September 11, 2001. I said goodbye to him at home before he left for work. My dad was an active duty FDNY firefighter, and he was at the site all day searching for survivors. Later, he was searching for the bodies of victims to return to their families. He worked tirelessly on the clean-up for several months.

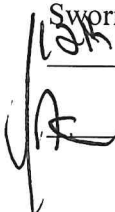
7. I don't think he wanted us to know the extent of his illness. He didn't want us to worry. I came home from college and saw him getting worse and worse. He was just home, suffering, with no energy. He had his thumb amputated, it hurt him all the time and was always bleeding. He was diagnosed with throat cancer and had radiation on his throat. He put on a brave face, but I knew he was dying. I knew he wasn't going to get better.

8. Emotionally, it was beyond horrible. Every day I was just watching it get worse and worse. It was like Groundhog Day every time I saw him. I remember the sound of him gasping for air. I'll never forget that. I felt guilty for not being able to do more for him. At the same time, none of us wanted to believe it was happening. He was like a shell of himself. Life became unenjoyable because my father couldn't be involved anymore.

9. He missed so much of our lives. He wasn't there to see me graduate college and never had the opportunity to walk me down the aisle when I got married. My children will never have the privilege of knowing him. I regret not saying "thank you" or "I love you" to him as much as I should have. I was only 21 years old when he died, and that's when I needed him the most. He was a source of guidance to me; everything was okay when he was there. I never felt the same after he died.

10. I think there should be justice for families like mine and for those who lost their loved ones due to 9/11. I'll never know what could have been. My dad was a selfless, courageous person, and he was a great father.


CAROLINE HALPIN

Sworn to before me this
 day of April, 2022

TANITSHA SIKES
NOTARY PUBLIC STATE OF NEW YORK
ERIE COUNTY
LIC. #01SI6111999
COMM. EXP. 06/28/2024